

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

**IN RE: INSULIN PRICING
LITIGATION**

**CASE NO. 2:23-MD-03080
MDL NO. 3080**

**JUDGE BRIAN R. MARTINOTTI
JUDGE RUKHSANAH L. SINGH**

Document Electronically Filed

**THIS DOCUMENT RELATES TO:
ALL TRACKS**

NOTICE OF JOINT MOTION TO SEAL

PLEASE TAKE NOTICE on July 21, 2025, or a date and time to be set by the Court, Defendants Emisar Pharma Services LLC, Novo Nordisk Inc., Sanofi-Aventis U.S. LLC, and Eli Lilly and Company (the “Moving Defendants”) by and through their undersigned attorneys, shall move before the Honorable Rukhsanah L. Singh, U.S.M.J., of the United States District Court for the District of New Jersey, for the entry of an order, pursuant to Local Civil Rules 5.3(c) and 7.1, sealing confidential material in the following documents that have been provisionally filed under seal:

- Plaintiffs’ Letter Regarding a Discovery Dispute with Emisar, filed May 21, 2025 [ECF No. 577];
- Exhibits 3, 5, 6, 7, 8, 9, 10, 12, 13, and 14 in support of Plaintiffs’ Letter,

filed May 21, 2025 [ECF Nos. 577-3, 577-5, 577-6, 577-7, 577-8, 577-9, 577-10, 577-12, 577-13, and 577-14]; and

- Emisar’s Response to Plaintiffs’ Letter, filed May 29, 2025 [ECF No. 590].

PLEASE TAKE FURTHER NOTICE that, in support of their Joint Motion, the Moving Defendants will rely on the Declaration of Liz Broadway Brown (“Brown Declaration”), the Declaration of Sam Rose (“Rose Declaration”), the Declaration of Liza M. Walsh (“Walsh Declaration”), the Declaration of Andrew Yaphe (“Yaphe Declaration”), and the Index required by Local Civil Rule 5.3(c)(3) in the form suggested by Appendix U (“Ex. 1”).

PLEASE TAKE FURTHER NOTICE that, pursuant to Local Civil Rules 5.3(c)(1) and 7.1(d)(4), no legal brief is required and all relevant proposed findings of fact and conclusions of law have been set forth in the enclosed Proposed Order in accordance with Local Civil Rule 5.3(c)(3).

PLEASE TAKE FURTHER NOTICE that the Moving Defendants have conferred with Plaintiffs and the other Defendants and are unaware of any party or non-party that objects.

PLEASE TAKE FURTHER NOTICE that proposed redacted versions of the materials sought to be sealed are attached to the Brown Declaration as follows: (i) ECF No. 577 is attached as Exhibit 3; (ii) ECF No. 590 is attached as Exhibit 4;

ECF No. 577-7 is attached as Exhibit 7; ECF No. 577-10 is attached as Exhibit 10. A proposed redacted version of ECF No. 577-8 is attached to the Yaphe Declaration as Exhibit 8. A proposed redacted version of ECF No. 577-9 is attached to the Rose Declaration as Exhibit 9.

Dated: June 20, 2025

Respectfully submitted,

/s/ Brian D. Boone

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